

EASTERN

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TEXAS AT DALLAS
~~William S. Family~~
~~We The Handicapable, et al~~

4:21-cv-00154-SDJ-KPJ

v.

Case Number: 3:21-cv-00379-K-BN

Ladera, et al.

**MOTION FOR APPOINTMENT OF COUNSEL TO BRIEF THE COMPLEX ISSUES
OR IN ALTERNATIVE EXTENSION OF TIME TO SEEK COUNSEL**

COMES NOW, Al M Williams, pro se', Intevenor Plaintiff, for his motion for appointment of Counsel states:

That I am a pro se' litigant and the matters before the court are of such complex nature requiring skilled advocacy on a Supreme Court level. In such cases of this magnitude and complexity appointment of counsel is appropriate. This litigation is a first and will set the bar. These are matters of first impression.

FILED

MAR 22 2021

Clerk, U.S. District Court
Eastern District of Texas

That an evidentiary hearing has been scheduled March 26, 2021 and plaintiff requests that advocate be appointed for this hearing.

* ~~That Plaintiff cannot comply with expedited briefing schedule.~~

That this Court has ordered complex briefing requiring skilled advocacy and technical writing and the plaintiff requests that an advocate be appointed to do so.

"The added layer of wicked complexity that Terkel now adds to pandemic-seems to even further bolster any contentions that a tenant facing eviction during COVID-19, who claims protection under CDC Order , should have counsel.....and that "Though advocates are urged not to mount such claims without first coordinating with the National Coalition for a Civil Right".....

The plaintiff has contacted the SMU Law clinic, National Coalition, Texas Pro Bono Access to Justice Commission and await their approval seeking an advocate and need time to be processed and approved.

"Pro Se' tenants can hardly be expected to effectively advance the kinds of arguments discussed in this memorandum.

That Appointment of Counsel is appropriate to investigate, research, and draft a brief of the issues.

That the litigants conferred and could not agree on extra time allotted for briefing issues. (14) days is the amount of time allotted to professional counsel. The plaintiff is pro se' untrained at law. Thus plaintiff asks the Court to extend the time to (28) days to allow the pro se' litigant time to find counsel and/or research in order to properly brief the issues; because these are matters of great importance to humanity as a whole. This case is not about the pro se' plaintiff (himself). It is about brotherhood, support, kindness and the perpetuation of the human race. These are matters of first impression issues must not be dealt with lightly.

WHEREFORE, ALL PREMISES, The plaintiff pray this Court appoint Counsel so that justice can be done.

/s/Al wms/s/
Al M Williams
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Dallas, Texas 75287
214-414-6371
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3-22-21

CERTIFICATE OF CONFERENCE

We have tried to come up with a reasonable time limit on briefing but could not agree.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded by first class mail [or, delivered in person, or certified mail] to each attorney/party of record on this date: EM AL.

3-22-21

Signature of Party

Print Name/Address/Phone Number:

3430 Accend Dr 2411
Dallas, TX 75287

Please list all parties/addresses to be served:

Daniel Paz

MS Judy